

E-filed: May 10, 2010

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Attorneys for Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT****DISTRICT OF NEVADA**

In re:

Case No.: BK-S-09-14814-LBR  
(Jointly Administered)THE RHODES COMPANIES, LLC, aka  
"Rhodes Homes," et al.,<sup>1</sup>

Chapter 11

Debtors.

Affects:

☐ All Debtors☒ Affects the following Debtor(s):

Hearing Date: May 11, 2010

Hearing Time: 1:30 p.m.

Courtroom 1

<sup>1</sup> The Debtors in these cases, along with their case numbers are: Heritage Land Company, LLC (Case No. 09-14778); The Rhodes Companies, LLC (Case No. 09-14814); Tribes Holdings, LLC (Case No. 09-14817); Apache Framing, LLC (Case No. 09-14818); Geronimo Plumbing LLC (Case No. 09-14820); Gung-Ho Concrete LLC (Case No. 09-14822); Bravo, Inc. (Case No. 09-14825); Elkhorn Partners, A Nevada Limited Partnership (Case No. 09-14828); Six Feathers Holdings, LLC (Case No. 09-14833); Elkhorn Investments, Inc. (Case No. 09-14837); Jarupa, LLC (Case No. 09-14839); Rhodes Realty, Inc. (Case No. 09-14841); C & J Holdings, Inc. (Case No. 09-14843); Rhodes Ranch General Partnership (Case No. 09-14844); Rhodes Design and Development Corporation (Case No. 09-14846); Parcel 20, LLC (Case No. 09-14848); Tuscany Acquisitions IV, LLC (Case No. 09-14849); Tuscany Acquisitions III, LLC (Case No. 09-14850); Tuscany Acquisitions II, LLC (Case No. 09-14852); Tuscany Acquisitions, LLC (Case No. 09-14853); Rhodes Ranch Golf and Country Club, LLC (Case No. 09-14854); Overflow, LP (Case No. 09-14856); Wallboard, LP (Case No. 09-14858); Jackknife, LP (Case No. 09-14860); Batcave, LP (Case No. 09-14861); Chalkline, LP (Case No. 09-14862); Glynda, LP (Case No. 09-14865); Tick, LP (Case No. 09-14866); Rhodes Arizona Properties, LLC (Case No. 09-14868); Rhodes Homes Arizona, L.L.C. (Case No. 09-14882); Tuscany Golf Country Club, LLC (Case No. 09-14884); and Pinnacle Grading, LLC (Case No. 09-14887).

1 APACHE FRAMING LLC  
2 BRAVO LLC  
3 GUNG-HO CONCRETE LLC  
4 THE RHODES COMPANIES LLC  
5 RHODES DESIGN AND DEVELOPMENT  
6 CORPORATION

7 **STIPULATION BETWEEN INTERNAL REVENUE SERVICE AND DEBTORS RE**  
8 **DEBTORS' SECOND OMNIBUS OBJECTION TO INTERNAL REVENUE SERVICE**  
9 **CLAIMS PURSUANT TO SECTION 502(b) OF THE BANKRUPTCY CODE,**  
10 **BANKRUPTCY RULES 3003 AND 3007 [DOCKET NO. 744]**

11 Regarding the *Debtors' Second Objection to Internal Revenue Service Claims Pursuant*  
12 *to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007* [Docket No. 744]  
13 (the "Objection"), filed by The Rhodes Companies, LLC and its affiliated debtors (collectively,  
14 the "Debtors"), the Reorganized Debtors and the Internal Revenue Service ("IRS") hereby  
15 stipulate and agree as follows:

16 1. Claim number 1-2 of the Internal Revenue Service in the amount of \$399.96 filed  
17 against Gung-Ho Concrete LLC is hereby allowed.

18 2. Claim number 7-1 of the Internal Revenue Service filed against Bravo LLC is  
19 moot given that the IRS has filed an amended claim. The Parties shall continue in good faith to  
20 resolve the amended claim. If such a resolution cannot be reached, the Reorganized Debtors  
21 shall reserve all rights to file an objection to the amended claim.

22 3. The remainder of the claims that are the subject of the Objection have been  
23 amended to \$0.00 by the IRS.

24 4. The Parties shall request at the hearing on May 11, 2010 that the Court either  
25 move the Objection off calendar or enter an order approving this Stipulation.  
26  
27  
28

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Dated: May 10, 2010

By /s/ Virginia Lowe, Esq.  
Virginia Cronan Lowe, Esq.  
Trial Attorney, Tax Division  
U.S. Department of Justice

Dated: May 10, 2010

By /s/ Shirley S. Cho  
Shirley S. Cho, Esq.  
Co-Counsel for the Reorganized Debtors

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